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Refer to: Johns-Manville Disposal Area, Waukegan, IL
Lake County/L0971900014
Superfund/Technical Reports
IEPA Comments on Draft Rod

April 6, 1987

Mr. Brad Bradley
Remedial Project Manager
CERCLA/SARA Enforcement Section
USEPA, Region V, 5HE-12
230 South Dearborn St.
Chicago, Illinois 60604

Dear Brad:

Per your request I am forwarding my comments from the review of the Manville/Waukegan, IL Draft Rod, dated March 31, 1987. Let me first say that this document was very well written, concisely reviewing all activities to date and outlining the rationale behind the proposed remedial action plan.

Under the section entitled Enforcement Analysis on page 4, I believe it should be noted that the consent decree anticipated for remedial design/remedial action work would include the Illinois EPA as desired by this Agency throughout the project.

As noted in a recent phone conversation, you had stated that the actual final cover regulation of "A compacted layer of not less than two feet of suitable material" would be added to the discussion of State of Illinois Requirements on page 10. I also agree that this would make that section more complete.

As you are aware, this Agency has expressed concern for the protection of groundwaters associated with this site before, and throughout this study. Manville has maintained in the FS that groundwater protection is only a secondary concern based on data collected during the Remedial Investigation which indicated only trace levels of pollutants. However, it should be noted that this information was collected during a single round from a five well network (monitoring a 120 acre study area) with three down-gradient wells located at least 200 feet from the waste disposal area boundaries. This Agency has therefore taken the position that an adequate groundwater detection monitoring network must be established and maintained during subsequent phases of this project. A contingency plan must be incorporated in the RD/RA Consent Order which ensures active corrective response by the company should significant contamination be confirmed in the "Post-Closure" monitoring reported to USEPA and IEPA.

The discussion of this monitoring system under the recommended alternative section on page 11 references Figure VII which is taken from the feasibility



study report. This figure is not consistent with well placement as recommended by me during the review of the draft FS. I understand that the detailed plan will actually be developed during the remedial design, however I believe that the ROD is a critical developmental mechanism and should be conceptually sound. I have therefore attached a revised figure showing well locations which place emphasis on:

1. Monitoring both at the water table (top of aquifer) and interface between the aquifer immediately under the disposal area and less permeable underclay and
2. Monitoring in several locations immediately down-gradient of the primary "solid" waste disposal area where any contamination should first be detected.

To construct an adequate groundwater monitoring network, this may eventually require more than the eight wells currently proposed, as the narrative points out. Additionally, I would like to note that IEPA wishes to pursue the ability to randomly sample these future monitoring wells in conjunction with Manville's required activities.

Finally, one other observation is made concerning the groundwater protection issue and the recommended alternative. At the end of the first paragraph on page 14, a new thought is introduced that groundwater protection is not of primary concern at this site because, "No receptors are located down-gradient from the site.". Considering the basic objective of CERCLA/SARA to eliminate/minimize endangerment to public health, welfare and the environment, this reasoning for no action in a situation where the waters of the State were being significantly polluted appears inconsistent with these environmental laws.

The schedule for implementation of the Remedial Design/Remedial Action is outlined on page 19. While I believe the design period is appropriate, I would like to note that a single season construction period for an earthwork project of this magnitude seems ambitious and possibly unrealistic. Whether the construction contract is written on a calendar or working day basis, late fall construction has historically been unpredictable due to variable weather conditions. Additionally, even if excavation work is completed, establishment of a vegetative cover at that time of year can easily fail. I would therefore recommend that the construction period be extended through early summer 1989, as this critical finishing work would be performed in the spring after the soil cover has dried out and is tillable.



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If you have any questions on these comments, please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "Kurt D. Neibergall", with a long horizontal flourish extending to the right.

Kurt D. Neibergall
Project Manager
Federal Site Management Unit
Remedial Project Management Section
Division of Land Pollution Control

KN:mls/2021g/88-90

Attachment

cc: Jim Frank
Terry Ayers
Don Gimbel
Gary King
Division File

Figure VII

